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18243N2/jjs/103119

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : No.19-20828-CMB

GEORGE C. SNYDER : Adversary Proceeding No. 19-02167-CMB

Debtor. : Chapter 13

HOOD HOLDING INC.,

Plaintiff,

v.

SHARON A. SNYDER GEORGE C. SNYDER, and TAMMY SNYDER McCARL

Defendants.

# NOTICE OF APPEARANCE, REQUEST FOR NOTICE AND SERVICE OF ALL DOCUMENTS, REQUEST FOR MATRIX ENTRY AND RESERVATION OF RIGHTS

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Bankruptcy Procedure 9101(b) and section 1109(b) of Title 11 (the "Bankruptcy Code") of the United States Code, Maurice A. Nernberg & Associates hereby appears as counsel for Sharon A. Snyder and Tammy Snyder McCarl, two Defendants in the above-captioned Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017 and 9010, Local Bankruptcy Rules 2002-2, 9010-2 and sections 342 and 1109(b) of the Bankruptcy Code, Defendants Sharon A. Snyder and Tammy Snyder McCarl hereby requests that all documents filed with the Court, all notices given or required to be given in the Debtor's case, and all papers served or required to be served in this case, be given and served upon the following, and that appropriate entry thereof be made on the Clerk's Matrix in the case:

Maurice A. Nernberg, Esquire <u>man@nernberg.com</u> PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure and Bankruptcy Code provisions specified above, but also includes, without limitation, all orders, notices hearing dates, applications, motions, petitions, requests, complaints, demands, replies, answers, schedules of assets and liabilities and statements of affairs, operating reports, plans of reorganization and liquidation and disclosure statements, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, telegraph, telex, facsimile transmission, electronic mail or otherwise that: (a) affect or seek to affect in any way any rights or interests of any creditor or party in interest in this case, including Defendants, Sharon A. Snyder and Tammy Snyder McCarl, with respect to, without limitation, (i) the Debtor, (ii) property of the estate or proceeds thereof, in which the Debtor may claim an interest, or (iii) property or proceeds thereof, in the possession, custody or control of others, that the Debtor may seek to use; or (b) require or seek to require any act, delivery of any property, payment or other conduct by Defendants, Sharon A. Snyder and Tammy Snyder McCarl.

PLEASE TAKE FURTHER NOTICE that Defendants, Sharon A. Snyder and Tammy Snyder McCarl, intend that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive: (a) the rights of Sharon A. Snyder and Tammy Snyder McCarl to have final orders and non-core matters entered only after de novo review by a District Judge; (b) the rights of Sharon A. Snyder and Tammy Snyder McCarl to trial by jury in any proceedings so triable in this case or any case, controversy or proceeding related to this case; (c) the rights of Sharon A. Snyder and Tammy Snyder McCarl to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) any other rights, claims, actions, defenses, set-offs or recoupments to which Sharon A. Snyder and Tammy Snyder McCarl is or may be entitled.

Date: October 31, 2019

/s/ Maurice A. Nernberg
Maurice A. Nernberg, Esquire
Pa.I.D. No. 00127
man@nernberg.com

Maurice A. Nernberg & Associates 301 Smithfield Street Pittsburgh, PA 15222 (412) 232-0334 Firm No. 331

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Chapter 13

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SHARON A. SNYDER

GEORGE C. SNYDER, and
TAMMY SNYDER McCARL

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Notice of Appearance, Request for Notice and Service of All Documents, Request for Matrix Entry and Reservation of Rights was served upon all parties to the within matter, this date, via the following methods:

### Via CM/ECF System:

J. Allen Roth, Esq. lawmatters@yahoo.com

David M. Nernberg dmn@nernberg.com

### **USPS First Class Mail:**

George C. Snyder 98 Arlene Drive North Versailles, PA 15137

Date: October 31, 2019

Defendants.

/s/ Maurice A. Nernberg Maurice A. Nernberg, Esquire Pa.I.D. No. 00127 man@nernberg.com

Maurice A. Nernberg & Associates 301 Smithfield Street Pittsburgh, PA 15222 (412) 232-0334 Firm No. 331